

800

From: Arvizu, Christy
Sent: Thursday, July 07, 2016 1:41 PM
To: Savino, Kathleen
Cc: Adams, Darvene; Arcaya, Alyssa; Mceathron, Kimberly; Modigliani, Justine
Subject: RE: Referral of Bayonne Dry Dock for CSI - DECA/DESA/CWD Workplan

Hi Kathleen –

Justine is out of the office until 7/21 and Kim is out until 7/11.

If you need additional specifics from WCB prior to Justine's return on 7/21/16, please let Kim or myself know.

Thank you,
Christy

From: Savino, Kathleen
Sent: Tuesday, July 05, 2016 6:12 PM
To: Arcaya, Alyssa <arcaya.alyssa@epa.gov>
Cc: Arvizu, Christy <Arvizu.Christy@epa.gov>; Adams, Darvene <Adams.Darvene@epa.gov>; Mceathron, Kimberly <McEathron.Kimberly@epa.gov>
Subject: Referral of Bayonne Dry Dock for CSI - DECA/DESA/CWD Workplan

Hi Alyssa, I'm just reading your msg now. I would have liked to hear the NGO concerns. In our workplan w/DECA, this facility is listed w/referrals by EPA/DEP and "citizen group interest".

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The NPDES Team here in DESA/MAB is continually looking for more engagement w/the Pgm Offices.

Thank you so much. Perhaps after my inspxn I will touch base w/you to find out more.

Can you generalize the concerns? E.g., are they worried material is going into the water? The air? Noise? Traffic?

Kathleen M. Foley
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From: Arcaya, Alyssa
Sent: Tuesday, July 05, 2016 2:29 PM
To: Savino, Kathleen <Savino.Kathleen@epa.gov>
Subject: RE: NJDEP NJPDES Permit Pgm Review/Audit - Bayonne Dry Dock?

Hi Kathy,

It was Siegi Pylypchuk with help from Kim McEathron. Siegi will be in touch with you about their findings shortly.

In addition to this, we had a meeting with a few NGOs about a year and a half ago to listen to their concerns about this and a few other dry docks in the area. I don't have any meeting notes and they sent us no background materials but can give you an overview of their concerns if you'd like to discuss.

I'm pretty open today and tomorrow -x3730 if you'd like to talk.

Alyssa

From: Savino, Kathleen

Sent: Tuesday, July 05, 2016 2:00 PM

To: Arcaya, Alyssa <arcaya.alyssa@epa.gov>

Subject: NJDEP NJPDES Permit Pgm Review/Audit - Bayonne Dry Dock?

Hi Alyssa,

Do you know who from EPA conducted a NJPDES Permit Pgm Review Audit recently w/a focus on Bayonne Dry Dock? I'll be doing an inspxn there and have been advised about some of the issues of concern.

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Savino, Kathleen

From: Hall, Robert <Robert.Hall@dep.nj.gov>
Sent: Tuesday, June 28, 2016 3:21 PM
To: Blaney, Christine
Cc: Savino, Kathleen
Subject: RE: BDD - Planning for sampling - questions re: WCR parameters.

I am unaware of what the labs do with samples once they receive them. I only know that we require 24-hour composite for all parameters with the exception of volatile organics and cyanide, which we ask for grabs.

Sampling if they are not in the middle of a job may still be representative depending on how much they cleaned up since the last job.

From: Blaney, Christine
Sent: Tuesday, June 28, 2016 2:52 PM
To: Ball, Kevin; Hall, Robert
Subject: FW: BDD - Planning for sampling - questions re: WCR parameters.

Hi Guys,
Can you shed any light on Kathleen's sampling questions? Also, do you have a copy of the full SW/Class B permit?
Thanks,
Christine

From: Savino, Kathleen [<mailto:Savino.Kathleen@epa.gov>]
Sent: Tuesday, June 28, 2016 2:38 PM
To: Blaney, Christine
Cc: Ball, Kevin; Bannister, Ron; Hirsch, Don
Subject: RE: BDD - Planning for sampling - questions re: WCR parameters.

Thanks Christine, I was out of the office when you called. Do you have the stormwater permit also? I do have copies of both permits, but they seem to be only partial. Even the one you sent today does not have any footnotes re: specifics of sampling of WCR parameters. Sometimes VOA's are grab-composites (composited in the lab). Am I to conclude that those marked as "grab" spls are VOAs and those marked as "24-hour composite" are NVOAs and others? I will confirm w/my lab here in Edison/EPA. For ex, 1,2- 1,3- and 1,4-dichlorobenze are grab spls.

Re: My plan for sampling: Wed. July 6th set-up automated composite sampler for metals and NVOAs. Collect all other grabs probably on first day of 2-day sampling event. These will be 001A only unless it is raining. If BDD is not "sandblasting, painting, welding, etc..." then should I still go ahead and sample for "representativeness"?

001A – Mostly grabs: flow, pH, TSS, O/G, TOC, cyanide, metals (24-Hr composite), NVOA (24-C) and VOA (G-C). G-C is grab-composite. The WCR lists many parameters, some are grabs, some composites. I assume the VOAs are grabs and NVOAs composites. We cannot analyze all of the WCR parameters. I saw photos showing the dischg. Looks like water is shooting out. I presume I'll be able to collect composite samples from a pool of well-mixed water from the sump pump. (?)

Sediment - I plan to do the sediment sampling later, if at all. I want to check out the site first bc it says to use a mod'd VanVeen grab sampler. That's usually used w/a davit and a winch (from a boat?). I need to see if I can collect this in other means... ideas?

Re: SW outfalls 002A, 003A, 004A: Tentatively set for July 13 (if it rains), otherwise be prepared for next storm event in that location. pH (dischg & rain), TSS, TPH, COD, TOC, CN, Hg, metals, VOA and NVOA, tributyl tin (TBT).

Our lab no longer analyzes for herbicides. Of the WCR parameters – pesticides/PCBs, are there particular ones you definitely need sampled? I will check on our ability to run TBT.

I see the stormwater permit has TPH, yet 001A has O/G. I considered also collecting for TPH at 001A... your thoughts?

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From: Blaney, Christine [<mailto:Christine.Blaney@dep.nj.gov>]

Sent: Tuesday, June 28, 2016 12:32 PM

To: Savino, Kathleen <Savino.Kathleen@epa.gov>

Cc: Hall, Robert <Robert.Hall@dep.nj.gov>; Ball, Kevin <Kevin.Ball@dep.nj.gov>; Bannister, Ron <Ron.Bannister@dep.nj.gov>; Hirsch, Don <Don.Hirsch@dep.nj.gov>; Blaney, Christine <Christine.Blaney@dep.nj.gov>

Subject: RE: BDD - Planning & Permits... any flow charts or descriptions?

Kathleen,

Attached are the two NJPDES permits for Bayonne Dry Dock: Permit Number NJ0225746 is the surface water industrial wastewater discharge associated with outfall 001A, Permit Number NJ0165808 is the stormwater permit associated with outfalls 002, 003 and 004 (005 and 006 are sediment samples). The stormwater permit is in the process of being renewed now, as such you will see requirements for Outfall 001 that have been superseded by the renewed NJ0225746 permit. The only flow charts I have seen is what the facility had previously submitted for the renewal application. I am cc'ing Bob Hall and Kevin Ball who are the permit writers for both these permits to see if they have any of these charts they can forward to you.

As far as the discharges, the stormwater samples only discharge during heavy rain events due to the size of the facility and the surface water discharge is intermittent however they usually discharge daily. The facility installed a treatment system for this outfall to comply with the zinc and copper limits in the surface water permit. They are still under the ACO with our office until such time as they terminate it.

I would be happy to meet you onsite next week Wednesday, July 6. I am scheduled to be in Trenton on Thursday, July 7 and unable to make it the second day.

Any questions, feel free to call me.

Thanks,

Christine

Christine Blaney
NJDEP Northern Bureau of Water Compliance and Enforcement
7 Ridgedale Avenue
Cedar Knolls, NJ 07927
O: 973-656-4099
F: 973-656-4400
C: 609-468-8849
Christine.blaney@dep.nj.gov

From: Savino, Kathleen [<mailto:Savino.Kathleen@epa.gov>]
Sent: Monday, June 27, 2016 8:54 AM
To: Blaney, Christine
Subject: BDD - Planning & Permits... any flow charts or descriptions?

Hi Christine,

I'm preparing for the BDD inspection. My EPA counterpart, Kim McEathron, mentioned there were flow charts of the opn and descriptions in the permits. The 2 copies I have of the 2 permits are not complete and have no diagrams. What I have is mainly the monitoring parameters. Is it possible to send the entire permits for this facility.

I'm hoping to do a recon tomorrow on my way back from a mtg in NYC, then conduct the CSIs next wk – July 6-7.

I'm thinking the SW outfalls only dischg during rain events, correct?

The other permit – sump pump, how often does that discharge, ie, can I obtain a 24-hr sample from it?

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From: Arcaya, Alyssa
Sent: Wednesday, July 06, 2016 10:21 AM
To: Savino, Kathleen
Cc: Arvizu, Christy; Adams, Darvene; Mceathron, Kimberly
Subject: RE: Referral of Bayonne Dry Dock for CSI - DECA/DESA/CWD Workplan

Hi Kathy,

I have to admit that I don't really understand how enforcement and inspection responsibilities are divided between DECA and DESA. Is it typical for a site like the Bayonne Dry Dock to have inspectors from both DESA and DECA assigned to it?

Our meeting with the NGO groups included ORC, ERRD and DECA (including Kim McEathron, who has inspected this dry dock in the past). I don't think we in CWD knew that DESA also assigned inspectors to the site, otherwise we would have looped you in too. Our interest in this site is primarily to ensure the permit is written properly. The NGOs were concerned that the permits for this and other dry docks were improperly classified as minors and should be considered major permits. They argued that what the dry docks and DEP consider water transfers are in fact discharges, because the dry docks are not properly cleaned before being flooded with water. So to answer your question, the concern was primarily that chemicals from the stripping, cleaning and painting processes were contaminating the water and the nearby sediment.

As far as our role, we have not received a dry dock permit to review since fielding this meeting, but will do a close review when we have something to look at. And as you probably know, DECA did issue an Administrative Order and Notice of Civil Administrative Penalty Assessment in 2014, so you may want to touch base with them to coordinate on the issues that prompted those actions.

I'm around this week if you'd like to discuss further.

Alyssa

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Subject: RE: BDD - Planning & Permits... any flow charts or descriptions?
Attachments: BDDNJ0225746.pdf

Flow charts

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